

DATE: September 30, 1987

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TO: John Meyer, 6H-ES

FROM: Greg Uetrecht, JEG

SUBJECT: Work Assignment No.224  
Comments on the Draft Remedial Investigation/Feasibility Study  
Work Plan for Dyess Air Force Base, Texas

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## INTRODUCTION

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As part of the TES VI contract with EPA, Work Assignment 224, Jacobs Engineering Group Inc. (Jacobs) has generated comments on the Draft Remedial Investigation/Feasibility Study (RI/FS) Work Plan for Dyess Air Force Base near Abilene, Texas. The Draft RI/FS work plan was prepared by the Oak Ridge National Laboratory - Chemical Assessment Team in Grand Junction, Colorado.

The project work plan consists of separate portions identified as Part I through Part IV. Part I addresses the Remedial Investigation Sampling Plan (RISP) at the following waste disposal sites at Dyess Air Force Base:

- o Evaporation Pit/Waste Storage Tank
- o North Diversion Ditch
- o Fire Protection Training Areas No.1 and No.2
- o Landfill/POL Sludge Disposal Area No.2

Parts II through IV are related to the activities in the RISP. Part II is the Quality Assurance/Quality Control (QA/QC) Plan. Part III covers the Health and Safety Plan and Part IV discusses the Short-Term Community Relations Plan.

All four parts of the draft RI/FS work plan for Dyess Air Force Base were reviewed by Jacobs. Comments were written to support the objectives of an RI/FS at Dyess Air Force Base. The objective of the RI is to determine whether toxic or hazardous contaminants are present, have migrated, or have the potential of migrating beyond Dyess Air Force Base's boundaries by surface or subsurface routes. The objective of the FS is to identify, evaluate, and select appropriate remedial action alternatives to address specific site contamination problems as identified in the RI.

## COMMENTS

SUPERFUND FILE

Part I: Remedial Investigation Sampling Plan

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1.3.2.1 (Second Paragraph) p.1-10

REORGANIZED

"A buried railroad tank car, with a capacity of 10,000 gallons has been used as a major storage facility....Waste placed in the tank car by shop personnel included such items as carbon removing compounds, hydraulic fluids, penetrant oils, thinners, paints, and solvents." The third paragraph indicates that the tank is scheduled to be removed prior to the remedial investigation and that tank bottoms have not been tested or removed. It is recommended that Dyess address the removal of the tank car and analyze the tank bottoms

using the Toxicity Characteristic Leaching Procedure (TCLP) during the RI/FS process. Since solvent waste has been placed in this tank, the tank bottoms should be treated as F-solvent waste. Dyess should consider in the RI/FS report how 40 CFR 268 of RCRA will affect the removal of the tank bottoms.

#### 1.3.4 Hydrology p.1-25

The Dyess AFB Sand and Gravel Isopach Map does not have enough data points to make a thickness determination. At point 4.5, the isopach lines are incorrectly drawn.

#### 2.3.3 Monitoring Well Installation and Development p.1-33

"Fifteen monitoring wells will be installed in and around the potentially contaminated site. Tentative locations for the well installation are shown in Figure 1.10 (p.1-32)." The tentative locations of the wells at Site 1: Waste Storage Tank; Site 3: Fire Protection Area No. 2; and Site 5: Evaporation Pit are inadequate for determining the groundwater flow direction and gradient. Sites 1 and 5 could be aggregated together so that at least one up-gradient and three down-gradient wells would be adequately located. At Site 3, one additional well should be located south to southwest of the Fire Protection Training Area No. 2

Tentatively, eight groundwater monitoring wells are proposed for Site I: Landfill which may be adequate to determine the groundwater flow direction and gradient. However, no wells have been located to the west of the landfill, which is at the boundary of the installation. At least two wells should be located on the western side of the landfill to assess the potential for off-site groundwater contamination.


#### Well Installation (Fourth Paragraph) p.1-33

~~"The annulus between the well screen and the wall of the bore hole will be packed with the appropriate size filter sand."~~ This section should provide more details on how the sand filter pack will be designed with respect to the size of the openings in the well screen and the particle size of the formation.

#### 2.3.8 Local Hydrologic Characterization (Third Paragraph) p.1-40

"Three alluvial wells will be drilled to obtain additional lithologic data, and to perform a pump test." A pump test, when done properly, is one of the best tools for characterizing local hydrology. The procedures and location of the pump test should be spelled out in a separate section in the workplan. Is the pump test only being performed to determine the characteristics of the alluvial aquifer or will a pump test be performed in the deeper aquifer to determine interconnection of the aquifers and their hydrogeological properties?

#### 2.3.13 Decontamination Procedures p.1-42

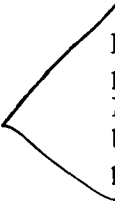


"All steam cleaning wash water shall be collected and disposed of in the base waste water treatment system." How will Dyess AFB determine if the waste which they are currently generating is not a RCRA waste? Will the waste water be tested before disposing in the base waste water treatment system?

## **Part II: Quality Assurance/Quality Control (QA/QC) Plan**

The QA/QC Plan adequately provides specific descriptions of the field and laboratory procedures to be employed to assure accuracy, precision, completeness, representativeness and comparability in the collection of both environmental samples and subsequent chemical analysis of the samples.

Table 2.3 Specification for Field QA/QC Samples p.2-12



Field (trip) blank and equipment blank samples will be used for five percent of all samples. We recommend (per the RCRA Technical Enforcement Guidance Document Guidelines) that both field (trip) blank and equipment blank samples have a frequency use of ten percent for all samples.

## **Part III: Health and Safety Plan**

The Health and Safety Plan adequately addresses responsibilities, establishes personnel protection standards, and mandates safety practices and procedures.

## **Part IV: Community Relations Plan**

Dyess AFB has prepared a well-planned community relations program which is established to distribute understandable, accurate information about the progress and findings of the information to the public. Dyess AFB will solicitate the public viewpoints concerning findings of the investigation.